

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

	) Case No.: 1:22-cv-13158-TLL-PTM
CHARITY HALASZ and THOMAS	)
HALASZ, on Behalf of their Child,	) HON. THOMAS L. LUDINGTON
H.H., a Minor,	)
	)
Plaintiff,	)
v	)
	)
CASS CITY PUBLIC SCHOOLS, in its	)
Official Capacity; WILLIAM HARTZELL	)
(in his Official and Individual Capacity);	)
ALLISON ZIMBA (in her Official and	)
Individual Capacity); DONALD MARKEL	)
(in his Official and Individual Capacity);	)
and STACEY BLISS (in her Official and	)
Individual Capacity),	)
	)
Defendants.	)
	)

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## DEFENDANTS' WITNESS LIST

NOW COME the above named Defendants by and through their Attorney, KAILEN C. PIPER, and hereby lists the following witnesses who may be called to testify in this matter.

1. H.H., Minor Plaintiff;
2. Charity Halasz, Plaintiff;
3. Thomas Halasz, Plaintiff;
4. William Hartzell, Defendant;
5. Allison Zimba, Defendant;
6. Donald Markel, Defendant;
7. Stacey Bliss, Defendant;
8. Janie Meeker, Defendant;
9. Emily Lasceski, Defendant;
10. George Batty, Defendant;
11. Scott Richards, Defendant;
12. Officers, agents, employees, and / or record keepers of the Michigan State Police;
13. Officers, agents, employees, and / or record keepers of the Cass City Police Department;
14. Expert witnesses to be named;

15. Any and all individuals named in Interrogatory Answers and/or deposition testimony;

16. Any and all individuals named in any other Witness Lists in this action;

17. Any and all rebuttal witnesses;

18. Defendant reserves the right to call any witnesses necessary to authenticate any records produced by any of the parties;

19. The keepers of the records of all of Plaintiff's physicians, surgeons and medical care providers and facilities where the Plaintiff has been examined, diagnosed or treated for a period of ten years past through the date of the Trial of this cause;

20. All physicians, surgeons and medical care providers with whom the Plaintiff has been examined, diagnosed or treated for a period of ten years past through the date of the Trial of this cause;

21. That Defendants reserve the right to amend their first Witness List and/or list different or additional witnesses as they become known through the time of Trial of this matter;

22. That Defendants reserve the right to call or not to call any listed witnesses in person or by deposition and/or video deposition and reserves the right

to call a witness live at the time of the jury Trial of this cause even if a Trial deposition of a witness has previously been taken.

Respectfully submitted,

Date: May 8, 2023

/s/ KAILEN C. PIPER (P 82865)

Attorney for Defendants  
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Saginaw, Michigan 48638

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send confirmation of such filing to the following:

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Respectfully submitted,

Date: May 8, 2023

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